

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

AJM MANAGEMENT, LLC,

Case No.: 23-41664-nhl

Debtor.

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AFFIDAVIT OF AVRUM J. ROSEN OF NO ADVERSE INTEREST

STATE OF NEW YORK)
) ss.:
COUNTY OF SUFFOLK)

Avrum J. Rosen, an attorney at law duly admitted to practice before this Court affirms the following under penalty of perjury:

1. I am a member of the Law Offices of Avrum J. Rosen, PLLC (the “Firm”) and make this affidavit in support of the application of AJM Management, LLC, the debtor and debtor-in-possession (the “Debtor”), for an order authorizing the Debtor to retain the Firm as counsel in this case effective as of May 12, 2023.

2. I am admitted to practice before this Court and am qualified to represent the Debtor in all matters pertaining to the administration of the case. Bankruptcy presently constitutes eighty-five percent (85%) of the Firm’s practice.

3. The undersigned is the attorney who will bear primary responsibility for the representation of the Debtor.

4. The undersigned has read and is generally familiar with Title 11 of the United States Code (the “Bankruptcy Code”) together with current amendments, the Federal Rules of Bankruptcy Procedure, the E.D.N.Y. Local Bankruptcy Rules, and this Court’s Chamber’s Rules.

5. The services rendered or to be rendered include the following:

- (a) analysis of the financial situation, and rendering advice and assistance to the Debtor in determining whether to file a petition under the Bankruptcy Code;
- (b) preparation and filing of the petition, schedules, statement of financial affairs and other documents required by the Court;
- (c) representation of the Debtor at the meeting of creditors;
- (d) preparation of motions, documents and applications in connection with the case; and
- (e) rendering legal advice to the Debtor in connection with all matters pending before the Court.

6. The undersigned is competent to represent the interest of the entity on whose behalf representation is now sought in all proceedings now pending or which may reasonably be expected.

7. The undersigned does not hold or represent an interest adverse to the Debtor or to the estate and is disinterested as that term is defined in section 101(14) of the Bankruptcy Code.

8. As the result of inquiries, deponent believes that the Firm and the undersigned have no connection with any creditor or interested party. The Firm performs a conflict search from memory, a word search of the Debtor, its members and creditors and adverse parties on its client files and through the conflict software on its Sage Timeslips software.

9. The Firm and Avrum J. Rosen do not hold or represent any interests adverse to this estate or to the Debtor, and the Firm and Avrum J. Rosen are disinterested as that term is defined in section 101(14) of the Bankruptcy Code.

10. The Firm's retainer in the amount of \$15,000.00 and the bankruptcy filing fee in

the amount of \$1,738.00 were paid from the Estate of Basil Randolph Jones, a decedent's estate. The acceptance of the retainer from third a party does not affect this Firm's independent professional judgment and duty of loyalty to the Debtor, its estate and its creditors, and to maintain confidentiality.

WHEREFORE, deponent respectfully requests that the Court enter an order: (i) approving and authorizing the employment of the Firm as attorneys for the Debtor effective as of May 12, 2023; together with (ii) such other, further and different relief as this Court may deem just and proper.

/s/ Avrum J. Rosen
Avrum J. Rosen

Sworn to before me this
6th day of June, 2023

/s/ Nico G. Pizzo
Nico G. Pizzo
Notary Public State of New York
Qualified in Suffolk County
No. 02PI6384544
Commission Exp. 12/17/2026